

Board of Ethics Town of Greenwich, Connecticut

Instructions for Financial Interest Disclosure Form for Town Officers

To be filed no later than 30 days after June 30th of each year.

Who has to file?

All **Town Officers** are covered by the requirements of the Code of Ethics with respect to the filing of Financial Interest Disclosure Statements. If the aggregate amount received is \$200 or more, a statement must be filed for each transaction with the Town in any fiscal year (July 1 to June 30) that a Town Officer (or family member) has a direct or indirect personal financial interest in. *If a Town Officer didn't have a substantial personal interest in any transaction with the Town during the fiscal year, no filing is required.*

Who is a Town Officer?

A Town Officer is any official, employee or agent of the Town, any consultant to the Town or any member of any board, department, commission, committee, legislative body or other agency of the Town, whether elected or appointed.

What transactions are covered?

A transaction is defined broadly under the Code to include the sale or furnishing of any real or personal property, materials, supplies or services to the Town directly as a vendor or prime contractor, or indirectly as a subcontractor, beneficial owner, family member or otherwise. Transactions include offers, even if they are not accepted, but do not include gifts and similar arrangements where no valuable consideration is paid by the Town. Town employees and contractors are not required to report on the contract for services which makes them a Town Officer. Transactions with the Town include all Town boards, commissions, agencies or other entities owned or controlled by the Town.

What has to be reported?

Transactions aggregating less than \$200 a year do not need to be reported. The Code requires that Town Officers report both the nature of their

interest in a Town transaction and the amount received during the fiscal year as a result of that interest.

Line by line guidance:

All Town Officers are required to use the form prescribed by the Board of Ethics. Following are explanations of the information required to be provided on each line.

1. **Name:** Give your full name as it appears in the Town's official records with respect to the position you hold.

2. **Town Position:** List the title of your position as a Town Officer. If you have more than one appointed or elected position or are employed by more than one department or agency of the Town, list each position.

3. **Fiscal Year:** Indicate the fiscal year reported on.

4-8. **Transaction:** A separate form is required for each transaction. Where the Town enters into a single arrangement for a series of sales or engagements under the same terms, it should be considered a single transaction. Provide a brief description of the transaction including the name of the Town department or other agency involved, the date of the contract or service, its total value, the name of the party contracting with the Town and your relationship to the contracting party.

9-11. **Nature of Interest.** Describe the nature of your interest in the transaction, such as contracting party or an owner, partner in or employee of the contracting party (or family member thereof). Family members include parents, spouses, siblings, children, nieces and nephews grandchildren and in-laws. Show the value received by the contractor. You may also show the share of that amount you received.

13-14. **Other Information:** Provide any additional information as appropriate.

6. **Signature:** Use your normal written signature.



Town of Greenwich

Ethics Disclosure Form

Financial Interest in Town Transaction

All Town Officers, including all elected or appointed officials, Town employees or agents or consultants to the Town, are required to report financial interests in Town Transactions. They must report if they or a related party receive payments or other compensation having a value of \$200 or more during any Town Fiscal Year as a result of transactions with the Town. The following form has been approved by the Board of Ethics for in person filing. Please follow the instructions below to complete the form and file it with the Town Clerk. Items marked by an asterisk are required to be completed. If exact dates or amounts are not known, please use best estimates and provide an explanation. You may attach additional sheets if necessary.

1. Name*

Give your full name as it appears in the Town's official records.

2. Town position(s)*

List all positions currently held with the Town, including: 1) any elected or appointed offices, 2) employment by the Town or any entity owned or controlled by the Town, 3) membership on any Town Board, Commission, Committee or other agency or 4) services as an agent for or consultant to the Town.

3. Fiscal Year*

Indicate fiscal year being reported on.

4. Description of the Transaction*

Describe the nature of the Town transaction, indicating the department or agency involved and the materials, supplies or services furnished or to be furnished or the real or personal property otherwise involved. A separate form is required for each transaction. Where the Town enters into an arrangement for a series of sales or engagements for services under a single contract, it should be considered a single transaction.

5. Date of transaction or bid submission*

Date of transaction or bid submission

6. Total transaction value*

Provide the total estimated amount of payments to be made by the Town or other value to be given by or received from the Town. If actual amount varies significantly in the future, you should file an amended disclosure.

7. Transacting party*

If you are providing goods or services to the Town directly as an individual, enter "Self." If you are not the direct contractor with the Town, please provide the legal name used by the person or legal entity entering into the above transaction with the Town and also indicate the names of any persons or entities through which you have an indirect interest in the transaction.

8. Relationship to transacting party*

Indicate the nature of your relationship to the party or parties entering into the transaction with the Town. If additional information is appropriate, please use section 8 below.

9. Nature of Financial Interest*

Describe the nature of your interest in the transaction, such as contracting party or an owner, general or limited partner, shareholder or employee of the contracting party (or family member thereof). Family members include parents, spouses, siblings, children, nieces and nephews, grandchildren, in-laws and any other person legally entitled or reasonably expected to receive substantial financial support. If your interest in the transaction is as a family member of the contracting party indicate the nature of the relationship (e.g. spouse, child, parent, sibling, aunt, uncle, cousin, in-law, legal guardian, civil partner). Nominal interests having an aggregate value of less than \$200 in any Town fiscal year are not considered substantial financial interests and do not need to be reported.

10. Value Received*

\$ _____

To the best of your ability, estimate the total value expected to be received during the current fiscal year by you or the family member or other contracting party through which you have an interest in the transaction. The value should include increases in the value of tangible or intangible property owned, as well as other amounts received. If your interest is indirect, you are entitled to reasonable reliance on the amount reported or estimated by the contracting party. If the value of the transaction is not currently fixed, provide your best estimate of the value and file an amended report later if the value significantly varies from the estimate.

11. Additional Information:

Please provide any additional information you consider relevant here or attach additional sheets as necessary:

12. Value Received by Town Officer

If you do not expect to benefit from all or any of the value received by contractor, you may enter the portion of value you expect to receive above. You may indicate a percentage, a fraction or a dollar amount, or simply state "none" or "to be determined." If you are a direct contractor or subcontractor, you may estimate the net profit that you expect to receive.

13. Aggregate Transaction

If the above transaction is to be aggregated with another transaction, provide the date that the other transaction was reported:

Date transaction reported

14. Amended Filing

If this is an amended filing, please provide the date of original filing:

Date of original filing

15. Signature

Use your normal written signature. If signed by another on behalf of the reporting person, please print name after signature; this signature attests that the signer is authorized to sign this form on behalf of the Town Officer whose name is listed in Item 1 above.